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4/6/2015 5:29:41 PM
Dwight D. Sullivan
County Clerk
Galveston County, Texas

CV-0073982
CAUSE NO. _____

Jamie Montiel § IN THE COUNTY CIVIL COURT
Plaintiff §
v. § AT LAW NUMBER _____
AMK Express, Inc. and Alim Kuchiev § Galveston County - County Court at Law No. 1
Defendants § GALVESTON COUNTY, TEXAS

ORIGINAL PETITION

Plaintiff Jamie Montiel complains of AMK Express, Inc. and Alim Kuchiev and would respectfully show the Court the following:

I.

Nature of Action

1. Plaintiff suffered injury as a result of being struck by Defendant's vehicle.

Plaintiff seeks damages in excess of \$200,000.00 but less than \$1,000,000.00.

II.

Discovery Level

2. Discovery in this matter may be conducted under Level 3 of the Texas Rules of Civil Procedure.

III.

Jurisdiction and Venue

3. The claims asserted arise under the common law of Texas.
4. Venue is proper because the incident occurred in this County.

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STATE OF TEXAS
COUNTY OF GALVESTON

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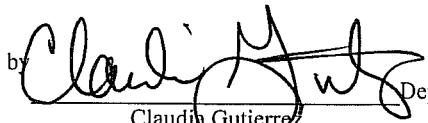


This above is a full, true, and correct photographic copy of the original record now in my lawful custody and possession, as the same is recorded in the Official Public Records of County Court at Law No. 1 in my office.

I hereby certify on July 6, 2015.

DWIGHT D. SULLIVAN, County Clerk
Galveston County, Texas




Claudia Gutierrez Deputy

IV.

Parties

5. Plaintiff is a resident of Texas.
6. Defendant AMK Express, Inc. may be served through its registered agent Alim Anvarovich Kuchiev at 2215 Bradford Drive, Wheaton, Illinois 60189.
7. Alim Kuchiev is an Illinois resident that may be served personally at 952 Community Drive, Wheaton, Illinois 60187.

V.

Facts

8. On or about October 16, 2014, Plaintiff suffered severe and debilitating injuries as a result of Defendant's negligence. Alim Kuchiev was driving for AMK Express on the date in question and was cited for the incident. Specifically, Defendant struck Plaintiff after running a red light at a high rate of speed. As a result of the collision, Plaintiff suffered severe injuries to his neck, back, and other parts of her body.

VI.

Causes of Action

A. *Negligence.*

9. Plaintiff repeats and realleges each allegation contained above.
10. Plaintiff sustained injuries because of Defendant's negligence when Defendant:
 - Failed to control his vehicle's speed;
 - Failed to operate his vehicle safely;

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by 
Claudia Gutierrez Deputy

- Failed to keep a proper lookout;
- Disregarded a traffic signal;
- Failed to maintain a safe distance; and
- Other acts so deemed negligent.

11. Defendant should also be held liable as a matter of law for his violations of the Texas Transportation Code.

12. As a result of Defendant's negligence, Plaintiff suffered severe physical injury. Plaintiff is entitled to recover for their injuries.

VII.

Prayer

Plaintiff prays for relief and judgment in a monetary amount over \$200,000 but less than \$1,000,000, as follows:

- Past and future medical damages;
- Past and future loss of earnings;
- Past and future physical pain and suffering and mental anguish;
- Past and future impairment;
- Past and future disfigurement;
- Interest on damages (pre- and post-judgment) in accordance with law;
- Costs of court;
- Costs of copies of depositions; and
- Such other and further relief as the Court may deem just and proper.

STATE OF TEXAS
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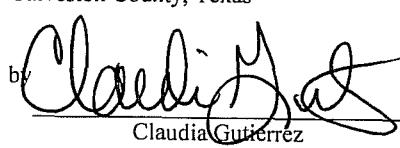
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Claudia Gutierrez
Deputy

VIII.

Jury Trial Demanded

Plaintiff hereby demands a trial by jury.

Respectfully submitted,

**PIERCE SKRABANEK
BRUERA, PLLC**

/s/ M. Paul Skrabanek

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ATTORNEYS FOR PLAINTIFF

STATE OF TEXAS
COUNTY OF GALVESTON

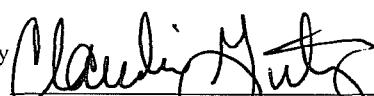
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